

1 to you. You're excused as a witness, thank you very
2 much.

3 THE WITNESS: Thank you.

4 JUDGE SIPPEL: I have one question for Mr.
5 Shook. I still have this opening -- I've got an
6 exhibit opening here for your number 58.

7 MR. SHOOK: I was -- okay. Well, Your
8 Honor, I do request that it be received into evidence.
9 I recognize that there has been repeated testimony by
10 Mr. Ramirez that he didn't recall receiving such, or
11 didn't remember reading such, but I would ask official
12 notice of this document as the instructions that go
13 along with the renewal application that Mr. Ramirez
14 filled out.

15 JUDGE SIPPEL: Any objection to that, Mr.
16 Price?

17 MR. PRICE: No objection, Your Honor.

18 JUDGE SIPPEL: All right. The Bureau
19 Exhibit which was marked yesterday as 58 for
20 identification is received into evidence as Bureau
21 Exhibit 58.

22 (Whereupon, the document referred to was

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1 marked for identification yesterday and received into
2 evidence today as Bureau Exhibit No. 58.)

3 JUDGE SIPPEL: We have our next witness,
4 why don't we go off the record for five minutes or so?

5 MR. SHOOK: Great. Thank you, Your Honor.

6 JUDGE SIPPEL: Thank you.

7 (Whereupon the above entitled matter went
8 off the record at 10:42 a.m. and resumed at 10:52
9 a.m.)

10 JUDGE SIPPEL: Your next witness will be
11 and I should notice that we do have additional counsel
12 at the counsel table, sir?

13 MR. DUNCAN: Correct, Your Honor. My name
14 is Bob Duncan and I'm here from Hogan Hartson on
15 behalf of SFUSD. As you may already know or certainly
16 will learn, Mr. Helgeson has -- and I know Mr. Shook
17 knows, has vision problems and so I was asked to be --
18 try to assist him through this process up until now.

19 Since I've done that, I'm sitting in here
20 today, if that's okay with you.

21 JUDGE SIPPEL: We appreciate your
22 presence. I was alerted to the fact that you would be

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1 participating as counsel at some point in the
2 proceeding and Mr. Shook has given me advance notice
3 of Mr. Helgeson's situation.

4 So, we will start -- it's almost 11:00 and
5 as I indicated yesterday, I'll be leaving the
6 courtroom quarter of 12:00 and returning at quarter of
7 2:00. Scheduling for the rest of the day, I'm here
8 until 6:00, 6:30 with -- if that's needed.

9 I don't think we're going to accomplish
10 too much over 6:30 based on this is a long day. But
11 I am going to continue to -- I'm going to continue
12 with our 9:15 starting time. I'm -- that's not a
13 punishment for lack of speed in the -- in terms.

14 I understand that all of this is very
15 difficult to get out and -- but I think that least we
16 can make up 45 minutes to an hour over the week if we
17 do that. My understanding is is that we probably will
18 be here Friday morning, is that looking that way or --
19 you don't have to give me a commitment now.

20 MR. SHOOK: Well, we're taking longer than
21 we had hoped we would. I can't speak for how long
22 USFSD might take with respect to Mr. Lopez.

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1 MR. PRICE: We don't anticipate Mr. Lopez'
2 cross examination taking very long Your Honor. I mean
3 I would say on the very liberal side, no more than an
4 hour and a half. But more likely less than 45
5 minutes.

6 JUDGE SIPPEL: Well let's see how it goes.
7 That's all we can really do. That's all we can hope
8 for. I don't want to cut anybody off or exhaust any
9 witness because of -- my effort to close the hearing
10 aspect of it by the end of Thursday.

11 On the other hand, it's -- it might be
12 rewarding target to shoot for I guess. It would be
13 one less thing if that's -- that's all up to the
14 parties and the witnesses. All right. Let's see.
15 Mr. Duncan, would you call your next witness then,
16 please sir?

17 MR. DUNCAN: Sure Your Honor. Thank you.
18 SFUSD calls William C. Helgeson to the stand for
19 purposes of responding to cross examination.

20 JUDGE SIPPEL: Step forward Mr. Helgeson,
21 please.

22 Whereupon:

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1 WILLIAM C. HELGESON

2 was called for examination by Counsel for the SFUSD
3 and, having been first duly sworn, assumed the witness
4 stand and was examined and testified as follows:

5 JUDGE SIPPEL: You have bottled water in
6 front of you there and let us know if you feel you
7 need to take a break or something. You'll only be on
8 the stand this morning for about 45 minutes, so, let's
9 see how far we can go.

10 MR. DUNCAN: Your Honor, if it pleases the
11 Court, I believe that the same arrangement was done
12 with Mr. Ramirez.

13 JUDGE SIPPEL: Yes it was.

14 MR. DUNCAN: There is a binder, which I'm
15 going to show Mr. Helgeson which we prepared which
16 contains the copies of his direct testimony along with
17 the exhibits that were referred to therein.

18 CROSS EXAMINATION

19 BY MR. DUNCAN:

20 Q Mr. Helgeson, I recognize that it it's
21 difficult, but might as well start now. If you could
22 take a quick look at at least the direct testimony

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1 which is the first some 17 pages maybe of that
2 document.

3 A This right here?

4 Q That document, yes. Just confirm -- look
5 at it as much as you need to confirm for us that it
6 does look like it is the -- a copy of the direct
7 testimony that you've given in this case.

8 A Okay.

9 Q Can you do that?

10 MR. PRICE: Your Honor, while the witness
11 is reviewing his testimony, may I approach just to
12 retrieve our binders that Mr. Ramirez was using?

13 JUDGE SIPPEL: Certainly. We'll go off
14 the record while the witness takes a look at this.

15 (Whereupon the above entitled matter went
16 off the record at 10:57 a.m. and resumed at 10:59
17 a.m.)

18 BY MR. DUNCAN:

19 Q Mr. Helgeson, have you had an opportunity
20 to review the direct -- the written direct testimony
21 that you have in front of you, which has been marked
22 as SFUSD Exhibit number 72?

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1 A Yes, I have.

2 MR. SHOOK: Mr. Duncan, just so you're
3 aware, T-2.

4 MR. DUNCAN: T-2, thank you.

5 BY MR. DUNCAN:

6 Q Is that document a copy of the testimony -
7 - the direct testimony that you've given in this case?

8 A Yes, it appears to be.

9 MR. DUNCAN: Okay. That's all I have for
10 now.

11 JUDGE SIPPEL: All right, thank you, Mr.
12 Duncan. Your witness, then, Mr. Shook or Miss -- who
13 is going to do the examination, Mr. Shook?

14 MR. SHOOK: Oh I get to talk again.

15 JUDGE SIPPEL: Okay.

16 REDIRECT EXAMINATION

17 BY MR. SHOOK

18 Q Mr. Helgeson, greetings.

19 A Good morning.

20 Q In connection with your preparation for
21 today, did you review any documents?

22 A Along with my attorneys, I have reviewed

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1 documents, yes.

2 Q Could you tell us what those documents
3 were?

4 A There were a number of documents.

5 Q Just try to go through as best you can and
6 tell us what they were.

7 A In no particular order, I remember looking
8 at declarations that I signed in 1988; the declaration
9 I signed in 2001; a letter of inquiry from the FCC
10 February of 2001; there were some memos and e-mails
11 that my attorneys asked me to review from -- that were
12 to or from Susan Jenkins and Ernie Sanchez. I
13 reviewed my written testimony that I just reviewed
14 here.

15 Q The review process that we're talking
16 about took place over the course of last month?

17 A Approximately.

18 Q Did you have an opportunity to review any
19 personal calendars?

20 A I don't recall reviewing any personal
21 calendar.

22 Q The term may not have been very helpful,

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1 I was also thinking of something -- though I was
2 thinking more of something like a Day Minder?

3 A No.

4 Q Did you have any diaries of any kind to
5 review?

6 A I had not diaries that I've kept.

7 Q Did you review anybody's deposition?

8 A I was able to review, along with my
9 attorneys, parts of the deposition I gave on September
10 28 last year.

11 Q Did you review a deposition from John
12 Covell?

13 A No, I did not review that deposition.

14 Q Did you review a declaration of John
15 Covell?

16 A I don't recall reviewing a declaration
17 from John Covell.

18 Q Did you review a declaration from Chuck
19 Finney?

20 A No, I didn't review one but I will just
21 point out that I know -- I believe that one did come
22 in, I think Nicole Sawaya mentioned, but -- he had

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1 one, but I didn't review it.

2 Q From Chuck Finney?

3 A Yes.

4 Q Did you review Nicole Sawaya's deposition
5 testimony, September 28, 2994?

6 A No, I did not.

7 Q With respect to your direct testimony in
8 this proceeding, SFUSD Exhibit T-2, did you draft the
9 questions that appear?

10 A No, the questions -- I didn't draft those
11 questions.

12 Q Did you provide draft responses to the
13 questions that were posed?

14 A Yes, I prepared a draft, yes. I prepared
15 the -- I worked on the questions with my attorney.

16 Q Did you have any documents to refer to as
17 you were preparing your responses to the draft
18 questions?

19 A In the course of preparing the answers, I
20 reviewed some documents.

21 Q Were those the same documents that you had
22 mentioned to us earlier?

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1 A Yes, I believe those -- there may have
2 been others, but I know I mentioned, I know for
3 instance the declaration.

4 Q Are there any documents that come to mind
5 that you didn't mention before?

6 A Not that I can remember at this time.

7 Q Now in connection with your written direct
8 testimony, did you review any bills that appear in
9 this proceeding as EB Exhibit 7? Those were bills
10 from the Sanchez Law Firm and I'm afraid there's no
11 easy way to do this other than to have your counsel
12 show you and then for you to take a little bit of time
13 to --

14 JUDGE SIPPEL: Why don't I just -- my
15 notebook is open to this -- for good reasons it's open
16 to this, why don't I just shove it across the table
17 and see if he can take a look at that. Is that okay?

18 MR. DUNCAN: If you need it on direct --

19 JUDGE SIPPEL: Is that all right with you,
20 Mr. Duncan?

21 MR. DUNCAN: That's fine.

22 THE WITNESS: So do you want to know if

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1 I've seen this document before? Is that what your
2 question was?

3 BY MR. SHOOK:

4 Q That was -- that's in connection with
5 preparing your direct testimony. My question at the
6 moment is whether you had reviewed the bills from Mr.
7 Sanchez.

8 A Is it just the one page or it goes on?

9 Q It keeps going.

10 MR. DUNCAN: It continues for several
11 pages.

12 JUDGE SIPPEL: Well, just looking at the
13 first page do you have a -- does that give you enough
14 of a familiarity with the document to say whether or
15 not you're generally familiar with these records?

16 THE WITNESS: I would say that I've seen
17 the invoices from Sanchez Law Firm. This doesn't seem
18 to be one that I -- just the way it's laid out; I
19 don't recall seeing this particular page.

20 JUDGE SIPPEL: Well, the other pages are
21 all going to look the same.

22 THE WITNESS: Yes, yes, I wouldn't say

1 that --

2 MR. DUNCAN: All right, Mr. Shook --

3 THE WITNESS: -- I'm familiar with this
4 page but I've seen -- I have seen invoices from the
5 Sanchez Law Firm and I did use dates on them to
6 refresh -- help refresh my memory regarding matters in
7 this proceeding.

8 BY MR. SHOOK:

9 Q So there were invoices from the Sanchez
10 Law Firm that you had an opportunity to review in
11 connection with the preparation of your direct
12 testimony?

13 A Yes, I would say that's true.

14 Q I would like you to now refer to EB
15 Exhibit number 35. The question is similar to the
16 other question. In connection with the preparation of
17 your written testimony, did you review the material
18 that appears in EB Exhibit 35 before you signed your
19 name to your testimony?

20 JUDGE SIPPEL: Would you state briefly for
21 the record what that exhibit is?

22 MR. SHOOK: EB Exhibit 35 is again,

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1 materials from the Sanchez Law Firm, reflecting
2 professional services in the amount of time spent and
3 the days that such services were rendered, beginning
4 in February 2001.

5 JUDGE SIPPEL: Thank you.

6 BY MR. SHOOK:

7 Q The document in question is addressed to
8 Mr. Helgeson.

9 A I believe I did review this, this document
10 as a way of preparing my answers for the testimony,
11 yes.

12 Q Thank you, Mr. Helgeson. Did you ever
13 tell anyone that the KALW public inspection file had
14 not been updated quarterly with issues programs list
15 during Jerry Jacob's tenure as general manager?

16 A I don't recall having that conversation
17 with someone.

18 Q Did you ever tell anyone that the KALW
19 public inspection file had been updated quarterly with
20 issues programs list during Jerry Jacob's tenure as
21 general manager?

22 A Once Jerry was there --

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1 JUDGE SIPPEL: Why don't we get the time
2 frame for the record anyhow, so --

3 MR. SHOOK: Jerry Jacob was the general --
4 the records reflect that Jerry Jacob was the general
5 manager of KALW during the '92 to '95 period. I have
6 -- I could give you more exact dates if need be, but
7 that gives you a rough idea.

8 JUDGE SIPPEL: Thank you.

9 THE WITNESS: The question again was, did
10 I tell anyone or --

11 BY MR. SHOOK:

12 Q The question -- there were actually, there
13 were two questions. The first one was did you tell
14 anyone that the quarterly issues programs list had not
15 been updated during MR. Jacob's tenure?

16 Then the second question was, did you
17 tell, did you ever tell anyone that the quarterly
18 issues programs list had been updated during MR.
19 Jacob's tenure as general manager?

20 MR. DUNCAN: We're -- you're asking him
21 the second of those now?

22 BY MR. SHOOK:

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1 Q Right, the second question is the one
2 that's on -- is open now.

3 A I would have to say I have no recollection
4 of having a conversation like that with anyone.

5 Q Now, basically the same two questions but
6 now focusing on a different general manager. Did you
7 ever tell anyone that the KALW public inspection file
8 had not been updated quarterly with issues programs
9 list during Rose Levinson's tenure as general manager?

10 A I'd have to say now that I don't have
11 recollection of that --

12 Q Did you ever tell --

13 A -- particular conversation.

14 Q Did you ever tell anyone that KALW public
15 inspection file had been updated quarterly with issues
16 programs list during Rose Levinson's tenure as general
17 manager?

18 A I don't have any recollection of having
19 that conversation with anyone.

20 Q Just for informing all of us who may have
21 forgotten here, wasn't Rose Levinson the general
22 manager who immediately preceded Mr. Ramirez?

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1 A Yes, she was.

2 Q She had been in that position for about
3 one-year?

4 A I would say approximately one-year without
5 reviewing, but I believe it was approximately one-
6 year.

7 Q Did you ever tell anyone that the KALW
8 public inspection file had not been updated quarterly
9 with issues programs list during Jeffery Ramirez's
10 tenure as general manager?

11 A I don't recall having that conversation
12 with anyone that I can recall.

13 Q Did you ever tell anyone that the KALW
14 public inspection file had been updated quarterly with
15 issues programs list during Jeffery Ramirez's tenure
16 as general manager?

17 A I don't recall having that conversation
18 with anyone.

19 Q Now, could you give us a general
20 description of what duties you had at KALW when your
21 job was classified as a clerk-typist?

22 A That was the first position I had. This

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1 was in approximately starting in 1987 I believe, it
2 was in '88 and it was a clerical position; I answered
3 the telephone, I opened mail. We did a lot of
4 mailings to people as far as asking for donations to
5 the radio station, I prepared some of those.

6 Often we would mail out -- people made a
7 donation to the station of a certain amount, we would
8 offer them a KALW coffee mug. I remember mailing out
9 a lot of coffee mugs; often when the mail would come
10 in, I'd sort the mail, make sure it would get to the
11 appropriate person.

12 When checks came -- often when we got
13 donations in, part of my job sometimes was to
14 processing -- in processing, keeping it, making a
15 record of and making up deposits and checks
16 periodically. During fund-drives I would be in charge
17 of scheduling volunteers to come in and help answer
18 the phones we'd encourage people to call in to make
19 donations on.

20 Sometimes just general office clean up is
21 part of the job. That's kind of the gist of what,
22 what I was doing. Overall, it was a very small staff

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1 so we kind of did a number of things.

2 Q When you started as a paid employee at
3 KALW, where was the station located?

4 A At that time it was located in the John
5 O'Connell High School building in San Francisco at the
6 corner of 21st & Harrison and it was on the top floor,
7 on the 5th floor of the building.

8 Q Did the station's location change because
9 of an earthquake?

10 A In -- yes, it did. In October of 1989,
11 there was an earthquake in San Francisco and it
12 damaged the building, the O'Connell High School
13 building, to the extent that city officials declared
14 the building condemned and we had to get the radio
15 station out of there. The high school had to leave
16 too.

17 The high school -- city had enough unused
18 buildings on the other side of town that the staff and
19 the students at the high school went over there. The
20 radio station basically split into two parts at that
21 point.

22 The -- we needed a studio and equipment

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1 and satellite dish and stuff and there was a
2 commercial radio station at the city that allowed us
3 to set up a small studio at their transmitter site.
4 This was at the transmitter site of KSFO Radio in San
5 Francisco.

6 Some of our staff had a personal
7 relationship with staff at that radio station so they
8 allowed us to build a little studio in there. The
9 administrative, non-broadcast side of the broadcasting
10 side of the station was put into what was the
11 gymnasium of the high school.

12 It was a separate building from the part
13 that was condemned and since the gym was no longer
14 used by the students, it was abandoned; we moved the
15 administrative side of the radio station, desks, file
16 cabinets, office computers into what was the girl's
17 locker room of the gymnasium. This was right the end
18 of October of 1989.

19 Q Now, which group of people did you
20 personally go with? Were you one of the persons who
21 went out to KSFO or were you one of the persons who
22 went to the girl's gymnasium?

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1 A Generally my job was at the administrative
2 side although because mail came in, tapes had to go
3 back and forth, generally once a day or once every
4 other day somebody -- one -- some of us would go
5 between the two facilities. But generally it was at
6 the administrative side.

7 Q Did there come a time when the studios and
8 the offices were reunited?

9 A Yes in 1991. We still didn't have a
10 permanent home for the radio station but instead --
11 and we just realized that we couldn't stay forever at
12 KSFO's transmitter, a temporary radio studio was built
13 up -- and studios, I should say, not -- it was more
14 than one -- was built up on the 2nd floor of the
15 gymnasium, which was a basketball court.

16 So the studios were basically rooms that
17 were built right on top of the basketball -- on the
18 court of the basketball court and the administrative
19 side of it, myself, general manager and so on, we
20 would -- we put our desks and file cabinets and
21 computers all just outside that, outside of those
22 rooms that were built. That was in approximately nine

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1 -- I think we were ready to move up there in spring of
2 '91.

3 Q Who was your general manager at that time?

4 A That would have been Daniel Del Solar.

5 Q And who became the general manager after
6 Mr. Del Solar left?

7 A When he left, Mr. Jerry Jacob became the
8 general manager.

9 Q Now did there come a time when your job
10 duties changed or evolved in some fashion?

11 A During that period of time specifically?

12 Q Well, I had asked you initially what you
13 had to -- so -- what your job duties were when you
14 first became a paid employee, so basically you should
15 probably -- you should interpret my question as
16 subsequent to that initial description of job duties,
17 did there come a time when your job duties evolved or
18 changed?

19 A Yes. I would say at that point, there had
20 come a time when there's been a staff cut and one of
21 the -- I was one of basically two administrative
22 clerk/typists in the office. I was basically the

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1 second one.

2 But that was the -- there was one other
3 person that was working there and due to staff cuts,
4 her position was eliminated so I was taking on
5 basically her job. She was doing the same sort of --
6 kind of duties that I was doing. Then also -- so I
7 was doing quite a bit more as far as coordinating
8 volunteers and so on at the station as time went over.

9 It wasn't a specific moment when all the
10 sudden, here, you have more job duties. It just kind
11 of grew over time. That included, for instance,
12 scheduling of announcers and so that happened over a
13 period of time that Mr. Jacob recognized that.

14 Q So this evolution, if you will, took place
15 primarily toward the end of Mr. Del Solar's tenure and
16 then during Mr. Jacob's tenure?

17 A That's -- I would say that's approximately
18 the time, yes.

19 Q Now you're familiar with the KALW program
20 guides, are you not?

21 A The KALW program guide?

22 Q Yes.

1 A Yes.

2 Q Are you aware that one of the regular
3 segments of the program guide, for lack of a better
4 way of putting it, lists the people who work at KALW?

5 A Yes, I believe that's on the inside back
6 cover generally.

7 Q Are you aware that at a point in time the
8 KALW guide would identify you as a subscription
9 coordinator?

10 A Yes, I do recall that.

11 Q Now what relationship did the
12 identification of subscription coordinator have with
13 your being classified as a clerk/typist?

14 A The term subscription coordinator was
15 strictly within the radio station. The clerk/typist
16 designation was a school-wide -- there were
17 clerk/typists at various facilities of the school
18 district and it was a civil service classification.

19 The term subscription coordinator, I think
20 that's what it was, was basically totally within KALW.
21 We referred to -- when people made donations to the
22 radio station, that they were effectively subscribing

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1 to the radio station. So that's how the term
2 subscriptions coordinator got -- came from. I think
3 it was term that Mr. Del Solar came up with.

4 Q That was I guess, to give people an idea
5 of one of your main functions at the radio station?

6 MR. DUNCAN: Objection, not sure how he
7 can tell what the -- Mr. Del Solar intended by coining
8 up a --

9 MR. SHOOK: Let me rephrase it in terms of
10 Mr. Helgeson, what was your understanding --

11 MR. DUNCAN: Standing objection, but go
12 ahead, you're rephrasing, go ahead.

13 BY MR. SHOOK:

14 Q What was your understanding as to why it
15 was that you were termed the subscription coordinator?

16 A I think we -- that the general manager,
17 Mr. Del Solar, and I both realized a great portion of
18 my job at that, time-wise, was taken up as far as
19 taking care of making deposits, opening up the checks
20 that came in, recording donations, sending out
21 mailings to often -- ran to the thousands of pieces to
22 people who had previously given -- made donations to

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